

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

SABIRHAN HASANOFF,

Defendant/Petitioner.

NOTICE OF MOTION

14 CV 7892 (KMW)

10 CR 162 (KMW)

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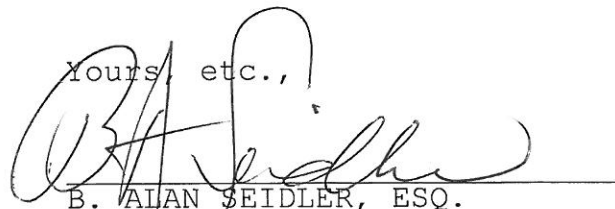
SIRS/MADAMES:

PLEASE TAKE NOTICE that upon the accompanying affidavit of the defendant/petitioner Hasanoff, sworn to the 16th day of October, 2014, and all the proceedings heretofore had herein, the defendant will move this Court before the Honorable District Judge Kimba M. Wood, at the United State Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, for an order:

1. To SEAL the record of all documents in these cases filed on the Electronic Case Filing system; and
2. Granting such other relief as to the Court appears just and proper.

Dated: New York, New York
October 17, 2014.

Yours, etc.,



B. ALAN SEIDLER, ESQ.
Attorney for Defendant
580 Broadway
New York, New York 10012
212-334-3131

TO: All Parties, filed by ECF

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v-

SABIRHAN HASANOFF,
Defendant/Petitioner.

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AFFIDAVIT IN SUPPORT OF SEALING THE ECF RECORD

STATE OF NEW YORK)

ss:

COUNTY OF NEW YORK)

B. ALAN SEIDLER, attorney for Petitioner Hasanoff Declares in support of this Motion to Seal:

1. I am the attorney for petitioner in this action in which he seeks to set aside his sentence pursuant to 28 USC @ 2255, of 200 months incarceration on Count One [Harboring or Concealing Terrorists, 18 USC @@ 2339B(a)(1), (d)(1)(D), (d)(1)(E), and 2], a consecutive 16 months incarceration on Count Two [Conspiracy to Defraud the United States]; a 3 year Supervised Release term; and a \$200 Special Assessment.

2. The @2255 motion was filed on or about September 30, 2014. Presently, an Order dated October 14, 2014, has been entered by the Court directing the Government to file its Answer, etc, by December 9, 2014, and the Hasanoff Reply is due January 5, 2014.

3. The case documents herein contain allegations concerning prior proceedings in the

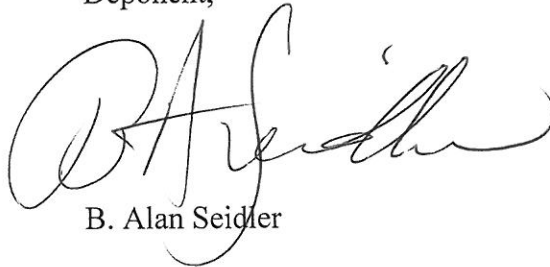
underlying criminal action that involve petitioner's relationship with the Government, and which if disclosed may jeopardize the safety of Petitioner. Consequently, petitioner requests the Electronic Case Filing system records be SEALED in this action.

4. No prior application has been made to any Court for this Recusal relief.

WHEREFORE, petitioner requests the Electronic Case Filing System Records be SEALED, and such other relief as is just and proper.

Dated: October 17, 2014.

Deponent,

A handwritten signature in black ink, appearing to read 'B. Alan Seidler', is written over the printed name.

B. Alan Seidler

Attorney for Hasanoff